

DENVER J. SHOOK
311 South Market Street
Frederick, Maryland
COMPLAINANT

NO. 19,339 EQUITY
IN THE CIRCUIT COURT FOR
FREDERICK COUNTY, IN EQUITY.

VS.

FREDERICK MEMORIAL CEMETERY COMPANY,
and all persons having or claiming
to have any interest in the property
located in Frederick District described
as 5 acres land, more or less, and
improvements and assessed to Frederick
Memorial Cemetery Company, and
JAMES H. FALK, COUNTY TREASURER
AND COLLECTOR OF TAXES for the
State of Maryland and the County of
Frederick

DEFENDANTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Denver J. Shook, of Frederick County, Maryland,
by W. Jerome Offutt, his Solicitor, respectfully shows:

FIRST: That on the 14th day of April, 1958, James H. Falk, County Treasurer
for Frederick County, Maryland, and Collector of Taxes for the State of Maryland,
and the County of Frederick, Maryland, acting by the authority of said office
sold to your Complainant, Denver J. Shook, at Public Auction for the sum of
Twenty-Six Dollars and Seventy-Five (\$26.75) Cents, the property located in
Frederick District described as 5 acres land, more or less, and improvements,
and assessed to Frederick Memorial Cemetery Company, on account of State and
County Taxes then due and in arrears, levied against said property.

SECOND: That on the 14th day of April, 1958, your Complainant, Denver J.
Shook, paid to the said James H. Falk, County Treasurer aforesaid, the sum of
Twenty-Six Dollars and Seventy-Five (\$26.75) Cents, as appears by the Certificate
of Sale No. 130, executed and issued by the said James H. Falk, County Treasurer
as aforesaid, and dated the 14th day of April, 1958, the said Certificate of
Sale filed herewith and marked "Plaintiff's Exhibit No. 1".

THIRD: That the said property hereinabove referred to has not been
redeemed by any party in interest, although more than one year from the date
of Sale on April 14, 1958, has expired.

FOURTH: That there is filed herewith a statement signed by James H. Falk
County Treasurer for Frederick County, Maryland, showing the amount necessary
for the redemption of the said property and which said statement is marked